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Attorneys for Defendant  
Sinochem Jiangsu Corporation

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ZIM INTEGRATED SHIPPING SERVICES, LTD.,

Plaintiff,

– v. –

BELCO RESOURCES, INC., SINOCHEN JIANGSU  
CORPORATION (FORMERLY KNOWN AS SINOCHEN  
JIANGSU IMPORT & EXPORT CORPORATION),  
NANJING HUABIN FOREIGN TRADE & ECONOMICS  
CO., LTD., DRAGONTRANS SHIPPING LTD. d/b/a  
HUABANG INTERNATIONAL, INC., SINOTRANS  
NINGBO INTERNATIONAL FORWARDING AGENCY  
CO., LTD., JOHN DOE 1-10,

Defendants.

07 CIV 5861 (RMB)

(Electronically Filed)

**NOTICE OF:**

**THE MOTION OF DEFENDANTS SINOCHEN JIANGSU CORPORATION AND  
HUABIN FOREIGN TRADE & ECONOMICS CO., LTD. TO DISMISS WITH  
PREJUDICE COUNTS II THROUGH IX OF THE SECOND AMENDED COMPLAINT  
AND TO VACATE THE RULE B ATTACHMENT**

**AND**

**THE MOTION OF DEFENDANT BELCO RESOURCES, INC.  
PURSUANT TO RULE (E)(4)(f) OF THE SUPPLEMENTAL ADMIRALTY RULES OF  
THE FED. R. CIV. P. TO VACATE THE RULE B ATTACHMENT**

**PLEASE TAKE NOTICE**, that upon the accompanying declaration of Hillel I. Parness, the exhibits annexed thereto, the accompanying declaration of Chen Huanzhong, and the accompanying memorandum of law, Sinochem Jiangsu Corporation ("Sinochem Jiangsu"), making a limited appearance in this action pursuant to Fed. R. Civ. P. Supp. Admiralty R. E(8), by its attorneys Lovells LLP, joined by Nanjing Huabin Foreign Trade and Economics Co., Ltd. by their attorneys, Tisdale Law Offices, LLC, hereby move this Court, before the Honorable Richard Berman, United States District Judge, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 21D, for an order dismissing the Second Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6), grounds of *forum non conveniens*, and vacating the Rule B Attachment accordingly.

**PLEASE TAKE FURTHER NOTICE**, that upon the accompanying memorandum of law, Belco Resources, Inc., also making a limited appearance in this action, by their attorneys, Bennett, Giuliano, McDonnell & Perrone, LLP, hereby moves this Court, before the Honorable Richard Berman, United States District Judge, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 21D, pursuant to Rule (E)(4)(f) of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure to vacate the Rule B Attachment.

**PLEASE TAKE FURTHER NOTICE** that the two memoranda of law described herein are contained in a single Joint Memorandum of Law being filed this day in accordance with this Court's Order of October 18, 2007.

Dated: New York, New York

November 28, 2007

LOVELLS LLP

By: /s/ Edward T. Schorr  
Edward T. Schorr (ES-0290)  
Hillel I. Parness (HP-1638)  
Matthew J. Galvin (MG 0701)

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*Attorneys for Sinochem Jiangsu Corporation*